

December 8, 2010

Ms. Sharon Fang, P.E.  
Remedial Project Manager (3HS21)  
U.S. EPA Region III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

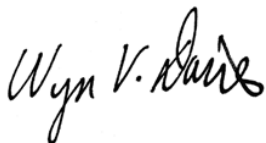
Re: Metal Bank Cottman Avenue NPL Site  
Monthly Report due December 10, 2010  
Reporting Period: November 1 through November 30, 2010

Dear Ms. Fang:

As provided in Paragraph 31 of the Utility Consent Decree, and on behalf of the Cottman Avenue PRP Group, Malcolm Pirnie as the Supervising Contractor is submitting to USEPA three copies of a written monthly progress report. Copies of the monthly progress reports are attached to this letter.

Please contact the Designated Project Coordinator, Dr. John Dobi (973.430.8036) or me (610.360.4895) if you need additional information regarding this submission.

Very truly yours,  
MALCOLM PIRNIE, INC.



Wyn V. Davies, CIH  
Senior Associate

Cc: Cottman Avenue PRP Group  
Steering and Technical Committees  
Joseph Vitale, P.E.  
Raymond E. Lees, P.E., CHMM  
Dan J. Jordanger, Esquire

Enclosures  
3809012



Project Name: Metal Bank NPL Site	For the Month: November 2010	
Project Location: Philadelphia, PA	Report Number: 56	Dated: December 8, 2010

Name: Wyn Davies (Malcolm Pirnie, Inc.)	Title: Project Manager
Telephone No.: (610) 360-4895	Telefax No.: (610) 768-5817
Reporting Period: November 1 through November 30, 2010	
<b>(a) Describe the actions which have been taken toward achieving compliance with the Consent Decree during the previous month:</b>	
<p>Remedial action monitoring continued throughout the month of November. Activities included the following:</p> <ul style="list-style-type: none"> <li>• Vegetative Cover Expert prepared an assessment report of native forage/meadow</li> <li>• Performed LNAPL Monitoring at the five sump locations</li> <li>• Enhanced/Maintained soil erosion &amp; sedimentation control aspects</li> <li>• Provided access to the site for the US EPA to monitor the post-construction work related to the approved Severson RAWP</li> </ul>	
<b>(b) Include a summary of all results of sampling and tests and all other data received or generated by Settling Third-Party Defendants or their contractors or agents in the previous month:</b>	
None	
<b>(c) Identify all work plans and other deliverables required by the Consent Decree completed and submitted during the previous month:</b>	
<ul style="list-style-type: none"> <li>• EPA to Cottman Ave PRP Group – The EPA provided email concerns regarding the availability of validated data for the first quarterly groundwater sampling event. (11/3/10)</li> <li>• EPA to Cottman Ave PRP Group – The EPA provided email comments to the Group regarding citing the wrong month for the groundwater second quarterly sampling and the potential schedule for the planting of the cover crop to enhance the landfill cap vegetative cover. (11/10/10)</li> <li>• Cottman Ave PRP Group to EPA – The Group provided a revised October Monthly Report to the EPA regarding the correction of the dates when the second quarterly groundwater sampling was performed.(11/01/10)</li> <li>• Cottman Ave PRP Group to EPA – The Group provided notice to the EPA regarding the proposed reseeding of a cover crop to enhance the revegetation as well as the November 1, 2010 correspondence from Ernst Conservation Seeds regarding their vegetative cover assessment report (11/18/10)</li> <li>• Cottman Ave PRP Group to EPA – The Group provided notice to the EPA regarding the scheduled December 8<sup>th</sup> for the implementation of the cover crop planting. (11/23/10)</li> <li>• EPA to Cottman Ave PRP Group – The EPA provided an email response to the Group</li> </ul>	

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<p>regarding the proposed reseeding of a cover crop to enhance the revegetation. (11/23/10)</p> <ul style="list-style-type: none"> <li>• Cottman Ave PRP Group to EPA – The Group submitted its response to the EPA regarding its commitment to perform a Fish Study that aligned with the previous discussions held with the EPA in October 2010. (11/23/10)</li> <li>• EPA to Cottman Ave PRP Group – The EPA provided a letter to the Group regarding the acceptance of the Long Term Monitoring Plan with one recommendation for inclusion of a certified taxonomist for SOP-6 and need to supply final signatory. (11/29/10)</li> </ul>
<p><b>(d) Describe all actions, including, but not limited to, data collection and implementation of work plans, which are scheduled for the next month and provide other information relating to the progress of construction, including, but not limited to, critical path diagrams, Gantt charts, and Pert charts:</b></p>
<p>The current month look-ahead schedule for O&amp;M is attached.</p> <p>The PRP Group will continue monitoring the post construction activities including:</p> <ul style="list-style-type: none"> <li>• Perform sheet pile wall monitoring</li> <li>• Maintain the soil &amp; erosion aspects</li> <li>• Monitor the LNAPL Trench Sumps for free product</li> <li>• Manage the data from the second round of groundwater monitoring</li> <li>• Perform the drill seeding of the cap to generate a cover crop</li> <li>• Continue monitoring of site for HSE compliance</li> </ul>
<p><b>(e) Include information regarding percentage of completion, unresolved delays encountered or anticipated that may affect the future schedule for implementation of the Work, and a description of efforts made to mitigate those delays or anticipated delays:</b></p>
<ul style="list-style-type: none"> <li>• All O&amp;M commitments are on schedule</li> </ul>
<p><b>(f) Include any modifications to the work plans or other schedules that Settling Third-Party Defendants have proposed to EPA or that have been approved by EPA:</b></p>
<ul style="list-style-type: none"> <li>• none</li> </ul>
<p><b>(g) Describe all activities undertaken in support of the Community Relations Plan during the previous month and those to be undertaken in the next month:</b></p>
<ul style="list-style-type: none"> <li>• The Group will coordinate with EPA on any community outreach endeavors on an as needed basis through the post construction period.</li> </ul>

ID	Task Name	Duration	Start	Finish	December					January		
					11/28	12/5	12/12	12/19	12/26	1/2	1/9	
1	Comments on LTM	146 days	Mon 5/10/10	Mon 11/29/10								
2	Submittal of Engineer Certification Report	1 day	Fri 5/28/10	Fri 5/28/10								
3	EPA Comments on Groundwater QAPP	141 days	Mon 5/17/10	Mon 11/29/10								
4	LTM Biota QAPP Resolution of Approach	44 days	Wed 9/29/10	Mon 11/29/10								
5	<b>Commencement of LTM</b>	<b>1132 days</b>	<b>Mon 7/26/10</b>	<b>Tue 11/25/14</b>								
6	<b>Grounwater Quarterly Monitoring</b>	<b>978 days</b>	<b>Mon 1/17/11</b>	<b>Wed 10/15/14</b>								
23	<b>Sheet Pile Wall Monitoring</b>	<b>1026 days</b>	<b>Wed 12/15/10</b>	<b>Wed 11/19/14</b>								
72	<b>LTM Quarterly Inspections</b>	<b>976 days</b>	<b>Wed 1/19/11</b>	<b>Wed 10/15/14</b>								
89	Performance of Fish Study	61 days	Mon 6/6/11	Mon 8/29/11								
90	Performance of Caged Worm Study	67 days	Sun 4/6/14	Mon 7/7/14								
91	Overseed Drill Planting of cover crop	1 day	Wed 12/8/10	Wed 12/8/10								
92	Overseed Drilling of Native grasses (If necessary)	4 days	Mon 8/23/10	Thu 8/26/10								
93	Invasive Species Herbicide Treatment - Milnc	2 days	Mon 8/23/10	Tue 8/24/10								
94	Invasive Species (Knot Weed) Treatment along Delaware River Bank	3 days	Wed 8/25/10	Fri 8/27/10								
95	Mechanically Eradicate Invasive Plants that have been treated	2 days	Wed 9/29/10	Thu 9/30/10								
96	Evaluation of Native Grass Germination	1 day	Wed 10/20/10	Wed 10/20/10								

Project: Metal Bank LTM Schedule Date: Tue 11/30/10	Task		External Milestone		Manual Summary Rollup	
	Split		Inactive Task		Manual Summary	
	Milestone		Inactive Milestone		Start-only	
	Summary		Inactive Summary		Finish-only	
	Project Summary		Manual Task		Deadline	
	External Tasks		Duration-only		Progress	